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VIA ECF

The Honorable Lewis J. Liman
Danial Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Lively v. Wayfarer Studios LLC, et al.*, Case No. 1:24-cv-10049-LJL;
Unopposed Motion to Redact and Seal Personal Information

Dear Judge Liman,

We represent Defendants Jed Wallace and Street Relations, Inc. Under Local Rule 7.1(e) and the Court's Individual Practices in Civil Cases 1.C, we write to request the Court allow to keep under seal exhibits to Ms. Lively's Motion to Compel¹. *See* 551-56; 554-1. The exhibit contains Mr. Wallace's cell phone number, email, and Street's banking information. A copy of the proposed redactions are attached.² **This letter motion is unopposed.** *See* Liman Individual Practices 1.C ¶3.

Federal district courts throughout New York have granted such requests to seal and redact a personal cell phone number as personal identifying information. *E.g.*, *In re Keurig Green Mt. Single-Serve Coffee Antitrust Litig.*, No. 14-MC-2542 (VSB), 2023 WL 196134, at *12 (S.D.N.Y. Jan. 17, 2023) (granting request to "redact personal information . . . such as personal cell phone numbers"); *In re Zyprexa Products Liab. Litig.*, No. MDL1596JBWASC, 2005 WL 2237789, at *2 (E.D.N.Y. Mar. 2, 2005) (granting request that party may "redact confidential personal contact information such as home telephone numbers and addresses, pager and personal cell phone numbers,"). An this Court granted a motion to seal for Wallace's personal cell phone number earlier in this case, as well as other parties' information. *See* Dkt. 467.

Similarly, Street's banking information should be sealed. Wallace and Street propose redacting limited information such as Street's routing and account numbers. Courts routinely grant this specific, rather than wholesale redaction request. *E.g.*, *McGraw Hill LLC v. Doe 1*, No. 20-CV-0356 (LJL), 2022 WL 2979721, at *1 n.3 (S.D.N.Y. July 26, 2022) (Motion requesting "Defendants' full financial account numbers be sealed. [Docket Cite] The Court grants Plaintiffs' motion to seal."); *Spencer-Smith v. Ehrlich*, No. 23-CV-2652 (LJL), 2025 WL 1115019, at *2

¹ The exhibits are labeled as referenced in Ms. Lively's Motion to Compel.

² Wallace and Street also redact the contact information of others for similar privacy-related reasons.

(S.D.N.Y. Apr. 15, 2025)(“Inasmuch as the request is to redact specific sensitive financial terms rather than to seal the contracts in their entirety, the request is granted.”)

Nothing in the relief sought by Ms. Lively turns on the precise order of digits in Mr. Wallace’s phone number, his email, or his banking information (e.g., routing number and account number). And Ms. Lively identifies no justifiable basis for disclosing it. Revealing Mr. Wallace’s personal cell phone number and email address publicly would him to the risk of being personally harassed, while disclosing Street’s banking information has its own obvious risks.

Accordingly, we respectfully ask the Court grant this *unopposed* letter motion to seal and redact Mr. Wallace’s personal cell phone number, email, and banking information in Lively’s Motion to Seal. *See* Dkt. 551-56; 554-1

We thank the Court for its attention to this matter.

Respectfully submitted,

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